22cr150 DWF/TNL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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|---|---|
| UNITED STATES OF AMERICA, | ) **INDICTMENT** |
| | ) |
| Plaintiff, | ) 21 U.S.C. § 841(a)(1) |
| | ) 21 U.S.C. § 841(b)(1)(B) |
| v. | ) 21 U.S.C. § 846 |
| | ) 21 U.S.C. § 853 |
| ALBERTO CHAVEZ-TORRES, | ) |
| | ) |
| Defendant. | ) |

THE UNITED STATES GRAND JURY CHARGES THAT:

## COUNT 1
(Conspiracy To Distribute Cocaine)

On or about September 18, 2019, in the State and District of Minnesota, and elsewhere, the defendant,

**ALBERTO CHAVEZ-TORRES,**

did unlawfully, knowingly and intentionally conspire with others, known and unknown to the grand jury, to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 846.
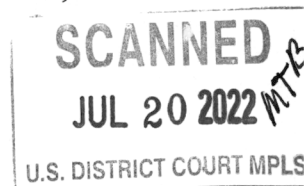
## COUNT 2
(Possession With the Intent To Distribute Cocaine)

On or about September 18, 2019, in the State and District of Minnesota, the defendant,

**ALBERTO CHAVEZ-TORRES,**

did unlawfully, knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a controlled

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substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

## FORFEITURE ALLEGATION

If convicted of either of Counts 1 and 2 of this Indictment, the defendant,

## ALBERTO CHAVEZ-TORRES,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of each such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation.  If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property under Title 21, United States Code, Section 853(p).

A TRUE BILL

_____          _____
UNITED STATES ATTORNEY                   FOREPERSON

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